

Message

From: Pavitt, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=31D144BE2F8043A2B6DE245E1706134A-PAVITT, JOHN]
Sent: 8/2/2019 9:06:23 PM
To: NSK Env Coord Air Quality & Spill Plans [n1037@conocophillips.com]
CC: Williams, Christopher [Williams.Christopher@epa.gov]
Subject: Records Request, EPA Air Compliance Inspection of ConocoPhillips, Kuparuk, CPF#1

Hello Catie and Brad. I'm sending this email to request records as part of the joint EPA/State of Alaska air compliance inspection on July 18, 2019 of the CPF#1 facility. The inspection focused on compliance with New Source Performance Standards (NSPS), Subpart OOOOa. During the inspection we visited the 1E and 1Q Pads.

Thank you for providing me during the inspection with copies of the *Fugitive Emission Monitoring Plan* and the most recent *Annual Compliance Report*, covering the time period April 1, 2018 – March 31, 2019.

Records Request:

1. Please send me records of leak inspections at 1E and 1Q Pads:
 - a. For new leaks identified during the inspection, confirm that the leaking components have been added to your tracking system and are on a schedule for repair.
 - i. Verify that the leaking components have been either tagged or documented with a digital photo showing the GPS coordinates.
 - b. For leaks placed on Delay of Repair in the *Annual Compliance Report* (June, 2018), please provide:
 - i. Daily inspection logs such as paper checklists used by your leak inspectors when the leaks were identified
 - ii. Photos and/or video of leaking components, showing GPS coordinates
 - iii. Photos of tags put onto leaking components
 - iv. Work orders related to repairing leaks
 - v. Follow up inspection records for all leaking components which have been repaired or replaced, and then resurveyed to verify they were no longer leaking.
 - c. In the 2018 *Annual Report*, the report states that components were designated as Unsafe-to-Monitor at Well Sites No. 3 and 12. Please provide the reasons that these sites were unsafe and a schedule of when you anticipate monitoring them for leaks.

I would appreciate receiving these records by Friday, August 16. Please let me know if you have any questions about this request.

Thank you again for the help ConocoPhillips provided during the on-site inspection.

Sincerely,

John Pavitt, Air Compliance Inspector
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